

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: § **CASE NO. 19-35298-H3**
§
PRESTIGE HEATING AND §
AIR CONDITIONING, LLC § **CHAPTER 11**
§
DEBTOR. §

**RESPONSE TO MOTION FOR RELIEF FROM STAY FILED BY
SANTANDER CONSUMER USA INC. DBA CHRYSLER CAPITAL**
(Docket No. 50)

Prestige Heating and Air Conditioning, LLC, (“Debtor”) responds to the Motion for Relief from Stay filed by Santander Consumer USA Inc. DBA Chrysler Capital.

1. Debtor denies relief requested in Paragraph 1.
2. Paragraph 2 does not require a response.
3. Debtor has no personal knowledge that Movant holds a security interest described in paragraph 3.
4. Debtor unaware of what action Movant took described in Paragraph 4. Debtor admits to not exempting the Property described in Paragraph 4.
5. Debtor admits to Paragraph 5.
6. Debtor admits to Paragraph 6.
7. Debtor has no personal knowledge of the value of the property described in Paragraph 7.
8. Debtor denies Paragraph 8.
9. Debtor denies Paragraph 9. Debtor has no personal knowledge of amount in Paragraph 9.
10. Debtor denies Paragraph 10.
11. Debtor denies Paragraph 11.

12. Paragraph 12 does not require a response.
13. Paragraph 13 does not require a response.
14. Debtor denies Paragraph 14.
15. Paragraph 15 does not require a response.
16. Paragraph 16 does not require a response.
17. Debtor denies the relief requested in Paragraph 17.
18. Debtor admits to Paragraph 18.

Dated: December 4, 2019

CORRAL TRAN SINGH, LLP

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ATTORNEYS FOR THE DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2019 the following interested parties on the attached Service List were served a copy of the foregoing via First Class Mail or CM/ECF.

/s/Susan Tran
Susan Tran